

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC, *et al.*,

Debtors.<sup>1</sup>

)  
) Chapter 11  
)  
) Case No. 20-33948 (MI)  
)  
) Jointly Administered  
)  
)

**HUNT OIL COMPANY’S AND AFFILIATES’ NOTICE OF ELECTION TO OPT OUT  
OF THIRD-PARTY RELEASES IN THE JOINT CHAPTER 11 PLAN OF  
FIELDWOOD ENERGY LLC AND ITS AFFILIATED DEBTORS  
AND RESERVATION OF RIGHTS**

Hunt Oil Company, Hunt Chieftain Development, L.P. and Hunt Oil Company of Louisiana, Inc. (together with each of their affiliates, collectively, “Hunt Oil”)<sup>2</sup> hereby file this notice (the “Opt-Out Notice”) with respect to the *Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors* [Docket No. 1284] (as may be amended, modified or supplemented from time to time, the “Plan”) and elect not to grant the releases contained in Section 10.7(b) of the Plan.<sup>3</sup>

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

<sup>2</sup> Such affiliates include but are not limited to: Chieftain International (U.S.) L.L.C., Chieftain International (U.S.) Inc. and each of their respective affiliates. For the avoidance of doubt, Hunt Oil Company and each of its affiliates intend by this notice to opt out of the third-party releases under the Plan, including without limitation, each and every Hunt-related entity that is a predecessor in the chain of title to property of a Debtor and/or a current or former party to a contract in which a Debtor is or was an assignee or also a party, in each case at any time before or after the Petition Date.

<sup>3</sup> Capitalized terms used but not defined herein shall have the respective meanings prescribed to them in the Plan, Disclosure Statement, or Disclosure Statement Order, as applicable.

1. On August 3 and August 4, 2020 (as applicable, the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”).

2. On April 15, 2021, the Court entered the *Amended Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing; (II) Establishing Solicitation and Voting Procedures; (III) Scheduling Confirmation Hearing; (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan; (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (VI) Approving Procedures for Objections to the Assignment and Transfer of Property of the Estate; and (VII) Granting Related Relief* [Docket No. 1286] (the “Disclosure Statement Order”), whereby the Court established June 2, 2021 at 4:00 p.m. (prevailing Central Time) as the Voting Deadline and approved, among other things, the Disclosure Statement, the form of Ballots and the Notice of Non-Voting Status.

3. Hunt Oil is unable to confirm receipt of a Notice of Non-Voting Status or Release Opt Out Form, but Hunt Oil has notified the Debtors that Hunt Oil is not a Releasing Party and, for the avoidance of doubt, does not consent to and affirmatively opts out of the third-party releases and related injunction contained in the Plan. Out of an abundance of caution and to comply with the Voting Deadline set forth in the Disclosure Statement Order, Hunt Oil hereby provides notice that Hunt Oil is not a Releasing Party and Hunt Oil does not consent to, affirmatively opts out of, and elects not to grant, the third-party releases contained in the Plan.

WHEREFORE, by this Opt-Out Notice, Hunt Oil does not consent to and affirmatively elects to opt out of the Plan's third-party release provisions, as they are currently stated or may be amended from time to time, and otherwise fully reserves all rights and waives nothing.

Dated: June 1, 2021

Respectfully submitted,

**BAKER BOTTS L.L.P.**

/s/ James R. Prince

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 1, 2021, I caused a copy of the foregoing to be served on all parties eligible to receive service through the Electronic Case Filing (ECF) System for the United States Bankruptcy Court for the Southern District of Texas by electronic mail.

/s/ James R. Prince

James R. Prince